

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

UNITED STATES DISTRICT COURT

AUG 14 2019

for the

JULIA C. DUDLEY, CLERK
BY: *ASingle*
DEPUTY CLERK

Western District of Virginia

Mark Taylor, Plaintiff

v.

Civil Action No. 7:19 CV 564

CMG Leasing, Defendant

COMPLAINT FOR CIVIL CASE

Plaintiff States that on Tuesday August 4, 2019 leasing office CMG located at 300 Downey St Radford Va made a false complaints to police that Plaintiff made repeated calls and death threats to their office and was on the way to carry out threats.

Plaintiff states CMG leasing acted out a result of retaliation by the CMG leasing office against Plaintiff due to complaints made by Plaintiff.

Plaintiff states that CMG leasing was negligent based in the dealings with Plaintiff about providing the most important information necessary about his occupancy agreement.

Plaintiff states that CMG Leasing stonewalls to use constant rhetoric to control and manipulate decisions and is unethical in their dealings. They are using these rhetoric to satisfy own self interest of willful intent to promote bias and, psychological harassment.

CMG failed to provide Plaintiff with copy of lease when requested multiple times. Errors were made to login information to inform that Plaintiff had paid all rent up front from December 29, 2019 to August 8, 2019 then Plaintiff was to pay monthly thereafter.

Plaintiff received an email of court action to move by CMG Leasing.

It is also understood that Plaintiff had full control of the apartment since all bills would be paid by current occupant which would be Plaintiff.

CMG leasing then wanted to remove Plaintiff from apartment on short notice and with false information about his occupancy due to the errors, and negligence done by CMG Leasing Office

Plaintiff states that he was going the office to inform them of how much he will not tolerate their rude and negative behavior, and the rhetoric being executed towards him and, there was never a threat to harm himself or others. They continued to stonewall, and promoted atmosphere of denial

Plaintiff states that August 4th, 2019 that he was taken into custody due false charges and statements by CMG leasing to the Radford Police.

Plaintiff states that due to poor judgement and negligent decisions a ECO was ordered which is Emergency Custody Order by the Radford Police department.

Plaintiff states that on his way to Richmond, VA, and Virginia Beach, VA, he made a rest stop in Charlottesville ,VA at the mall and was arrested.

Plaintiff was then informed by Charlottesville Police that there was a call to arrest him and the call came from Radford, Va.

Plaintiff was taken to University of Virginia Hospital due to the Emergency Custody Order, then to Carilion Hospital in Roanoke, and was found not to be a danger to himself or others.

Plaintiff had explained the incidents to hospital staff. However, due to the circumstances of the matter that was already known by Radford Police, that Plaintiff had no other violent intentions, and the whole decision was negligent to authorize that firm of custody.

Plaintiff was released on Thursday August 6, 2019 which would have been a day earlier

Plaintiff states as result of false written statements, and fabrication of fear which was purely outrageous behavior, and as an act of retaliation due to the complaints against them, and there has already been complaints by other former tenants.

Plaintiff was as a result of retaliation for complaints against the employees of CMG leasing for their lack of integrity and service and respect including their negligence located in Radford Virginia.

Plaintiff States that on December 29, 2018 he arrived into the renting office to take control of the apartment by sub lease agreement.

Plaintiff paid upfront from December 29, 2018 until August 8, 2019, and at multiple times requested a copy of the lease.

Plaintiff was officially the responsible tenant of the apartment, but has never received the lease upon request.

Plaintiff has suffered great humiliation, and embarrassment due to his ordeal.

The acts so far against Plaintiff were oppressive, and biased.

Plaintiff had suffered from extensive bias, and is subjected to severe Character Assassination.

Plaintiff has been subjected to demonizing statements against him.

Plaintiff states actions are in violation of the Law of Torts, and these actions were deliberate, willful, and malicious.

Relief is sought for Intentional Infliction of Emotional Distress, which is Humiliation, Embarrassment, Anguish, Negligence, Filing False Police Reports, Discrimination, and Slander.

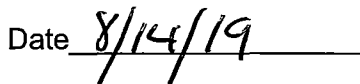
This is also Harassment of the Psychology of Blocking and Diverting, and Withholding, as they are used as manipulative rhetoric, and are not if the norms in society.

Relief is 50,000,000.00 (Fifty Million Dollars)

Mark Taylor

A handwritten signature in black ink, appearing to read 'Mark Taylor', is written over a horizontal line. A vertical line extends upwards from the signature area.

Date

A handwritten date '8/14/19' in black ink is written over a horizontal line.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

Mark Taylor

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

CMG Leasing

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 7:19 CV 564

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Mark Taylor603 Madison St. Apt. 36Radford, MontgomeryVirginia 24141(540) 230-0506

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

CMG Leasing
Business Leasing office
600 Downey St.
Radford, Va Montgomery
Virginia, 24141
(540) 633-1434

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII Discrimination based on Race, National Origin, Execution of Vacancy Laws

Intentional Infliction of emotional Distress

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) CMG Leasing, is incorporated under the laws of the State of (name) Virginia, and has its principal place of business in the State of (name) Virginia. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$0,000,000.00 Fifty Million Dollars

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

CMG Leasing made false claims to Police that Plaintiff made death threats repeatedly. Fabricated fears as tactic to convince that State men ts was fact. Plaintiff was arrested falsely due to these outrageous actions.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Intentional Infliction of emotional distress
Humiliation, Embarrassment, Slander
Discrimination, Negligence.
\$0,000,000.00 (Fifty million Dollars)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff


Mark Taylor

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address